COUNTY OF ORANGE

RESOURCES & DEVELOPMENT MANAGEMENT DEPARTMENT

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MCAS EL TORO
SSIC NO. 5090.3.A

April 25, 2006

Darren Newton
Base Realignment and Closure
(BRAC) Environmental Coordinator
MCAS El Toro, HQ, BRAC
7040 Trabuco Road
Irvine, CA 92618

SUBJECT: Revised Proposed Plan for the IRP at Former USMCAS, El Toro (Sites 8 & 12)

Dear Mr. Newton:

The above referenced item is a Revision of the Proposed Plan for the Installation Restoration Program (IRP) for the United States Navy. The proposed cleanup plan addresses soil containing the primary chemicals of concern (COCs) that were identified during extensive environmental investigations conducted at Sites 8 and 12.

The County of Orange has reviewed the Revised IRP and offers the following comments:

WATER QUALITY

It is recommended that the following issues be addressed in the document:

1. The Location-specific Applicable or Relevant and Appropriate Requirements (ARARs) should address the County of Orange National Pollutant Discharge Elimination System (NPDES) Permit Order No. R8-2002-0010. U.S. Marine Corps Station El Toro is listed within NPDES Permit Order No. R8-2002-0010 as an entity which is expected to actively participate in implementing the Orange County Storm Water Program (Finding 25 and Attachment C). As such, the water quality impacts of the project should be evaluated in accordance with the provisions outlined in Exhibit 7-I of the 2003 Countywide Drainage Area Management Plan (DAMP). At a minimum, the following information should be provided:

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4/27/06

a. A description of project characteristics with respect to water quality issues, such as project site location in a given watershed, site acreage, change in percent impervious surface area, and Best Management Practices (BMPs) to be incorporated into the project design.

b. A review of DAMP Exhibit 7.1 Table 7-I.1, Priority Projects Categories. If this project is considered a Priority Project, it will require the development of a Water Quality Management Plan.

c. Identification of receiving waters. The Revised IRP should identify all receiving waters that may receive runoff from the project site.

d. A description of the sensitivity of the receiving waters. In particular the Negative Declaration should identify Areas of Special Biological Significance, water bodies with Total Maximum Daily Loads (TMDLs); 303(d) listed impaired water bodies.

e. A characterization of the potential water quality impacts from the proposed project and identification of the anticipated pollutants to be generated by the project.

f. An identification of hydrologic conditions of concern, such as runoff volume and velocity; reduced infiltration, and increased flow, frequency, duration, and peak of storm runoff.

g. An assessment of project impact significance to water quality.

h. An evaluation of thresholds of significance.

i. If a proposed project has the potential to create a major new stormwater discharge[1] to a water body with an established TMDL, the Revised IRP should consider quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters.

j. A reasonable analysis of the cumulative impacts of the proposed project together with past, present and reasonably anticipated future projects (related projects) that could produce cumulative impacts with the proposed project.

2. Mitigation for the construction phase of the project should include compliance with the State General Construction Permit and the inclusion of the following as general or specific notes on project plan sheets:

   a. Sediment from areas disturbed by construction shall be retained on site using structural controls to the maximum extent practicable.

   b. Stockpiles of soil shall be properly contained to eliminate or reduce sediment transport from the site to the streets, drainage of facilities or adjacent properties via runoff, vehicle tracking, or wind.

   c. Appropriate BMPs for construction-related materials, wastes, spills or residues shall be implemented to minimize transport from the site to streets, drainage facilities, or adjoining properties by wind or runoff.

   d. Runoff from equipment and vehicle washing shall be contained at construction sites unless treated to reduce or remove sediment and other pollutants.

   e. All construction contractor and subcontractor personnel are to be made aware of the required best management practices and good housekeeping measures for the project site and any associated construction staging areas.

   f. At the end of each day of construction activity all construction debris and waste materials shall be collected and properly disposed in trash or recycle bins.

   g. Construction sites shall be maintained in such a condition that a storm does not carry wastes or pollutants off the site. Dischargers other than stormwater (non-stormwater discharges) are authorized under California's General Permit for Storm Water Discharges Associated with Construction Activity only where they do not cause or contribute to a violation of any water quality standard and are controlled through implementation of appropriate BMPs for elimination or reduction of pollutants. Non-stormwater discharges must be eliminated or reduced to the extent feasible.

      Potential pollutants include but are not limited to: solid or liquid chemical spills; wastes from paints, stains, sealants, solvents, detergents, glues, lime, pesticides, herbicides, fertilizers, wood preservatives, and asbestos fibers, paint flakes or stucco fragments; fuels, oils, lubricants and hydraulic, radiator or battery fluids; concrete and related cutting or curing residues; floatable wastes, wastes from any engine/equipment steam cleaning or chemical degreasing; wastes from street cleaning; and superchlorinated potable water line flushing and testing.

During construction, disposal of such materials should occur in a specified and controlled temporary area on-site physically separated from potential stormwater runoff, with ultimate disposal in accordance with local, state and federal requirements.

h. Discharging contaminated groundwater produced by dewatering groundwater that has infiltrated into construction site is prohibited. Discharging of contaminated soils via surface erosion is also prohibited. Discharging of non-contaminated groundwater produced by dewatering activities requires a NPDES permit from the Santa Ana Regional Water Quality Control Board.

OPEN SPACE/RECREATION

3. The Orange County Transportation Authority's Strategic Plan for regional bikeways identifies a Class I (paved off-road) bikeway parallel to the Metrolink/Amtrak railroad tracks in the project vicinity. The proposed bikeway will likely be located on the south side of the tracks, as the intent is to connect it to the Irvine Transportation Center. However, there is a possibility that the bikeway would be located on the north side of the tracks. The project applicant should be aware of this future bikeway as planning continues for the excavation and disposal of contaminated soil in the area.

Thank you for the opportunity to respond to the Revised IRP. If you have any questions, please contact Charlotte Harryman at (714) 834-2522.

Sincerely,

Ronald L. Tippets, Chief
Environmental Planning Division